

FILED
SCRANTON

JUN 09 2006

DEPUTY CLERK

In The United States District Court
For The Middle District of Pennsylvania

United States of America :

Vs

: 3:CR-05-493

Michael Curtis Reynolds : (Kosik, J)

Motion For an Order to Obtain Evidence

The DEFENDANT, having been advised by legal counsel, has determined a need to file the following:

- 1) Due to evidence being present within my property that is located in Idaho, It is requested that an order of the court be issued to recover said evidence and return it to a Defendant controlled location for evidence retrieval.

It is further suggested that a second order of the court be issued to have all Defendant property located at the Thunderbird Motel in Pocatello, Idaho and then ship the car to a Defendant-controlled location. Evidence pertaining to this case is within that property in Idaho, but due to issues with the

Prosecutions obsession to destroy evidence, it is both unwise and unsafe to attempt withdrawal of just the evidence needed by them, the vehicle being in thier control. The vehicle itself is now also evidence of further crimes related to this case, crimes against the Defendant that will be clear during the Pre-Trial conference.